

FILED
CLERK'S OFFICE

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

2003-12399-11 A 11:10
U.S. DISTRICT COURT
DISTRICT OF MASS.

Brimfield Housing Authority, et. al.,

Plaintiffs,

v.

Amerada Hess Corporation, et al.,

Defendants.

Civil Action No. 2003-12399RGS

**DEFENDANTS' MOTION TO STAY PROCEEDINGS
PENDING RULING ON TRANSFER AND CONSOLIDATION BY
THE JUDICIAL PANEL ON MULTIDISTRICT LITIGATION
(Hearing Requested)**

Pursuant to Local Rule 7.1, the undersigned defendants ("Defendants") respectfully move for a stay of all proceedings in this action until the Judicial Panel on Multidistrict Litigation ("JPML") determines whether this matter should be transferred to a single court and consolidated with numerous substantially similar actions also before the JPML as part of the existing MDL 1358 (*In re MTBE Product Liability Litigation*).

In support of this Motion, Defendants rely upon the accompanying Memorandum of Law.

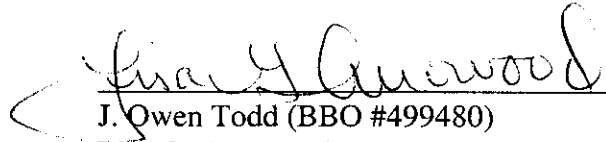
REQUEST FOR ORAL ARGUMENT

Defendants respectfully requests oral argument of the within Motion on the grounds that the within addresses the conservation of the parties, and judicial, resources, and that they believe oral argument will be of assistance to the Court.

Respectfully submitted,

CITGO PETROLEUM CORPORATION,

By its attorneys,

A handwritten signature in cursive script, appearing to read "Lisa G. Arrowood", is written over a horizontal line.

J. Owen Todd (BBO #499480)

Lisa G. Arrowood (BBO #022330)

Kathleen M. Genova (BBO # 563359)

Todd & Weld LLP

28 State Street, 31st Floor

Boston, MA 02109

(617) 720-2626

OF COUNSEL:

Nathan P. Eimer

Pamela R. Hanebutt

Lisa S. Meyer

Eimer Stahl Klevorn & Solberg, LLP

Suite 1100

224 South Michigan Avenue

Chicago, IL 60604

Dated: December 11, 2003

Joining Defendants:

Tracie L. Longman

Andrew G. Wailgum

Seth M. Wilson

Murtha Cullina LLP

99 High Street, 20th Floor

Boston, MA 02110

(617) 457-4000

(617) 482-3868 (fax)

J. Andrew Langan
Mark S. Lillie
R. Chris Heck
Kirkland & Ellis LLP
200 E. Randolph Drive
Chicago, IL 60601-6636
(312) 861-2000
(312) 861-2200 (fax)

Attorneys for Atlantic Richfield Company; BP America, Inc.; BP Amoco Chemical Company; BP Company North America Inc.; BP Corporation North America Inc.; BP Global Special Products (America) Inc.; BP Products North America Inc. (formerly known as Amoco Oil Company and misnamed as BP Products North Americas, Inc.)

Mark E. Tully
Goodwin Procter LLP
Exchange Place
Boston, MA 02109
(617) 570-1000
(617) 523-1231 (fax)

Attorney for Chelsea Sandwich LLC; Cumberland Farms Incorporated; Global Companies, LLC; Global Montello Group, LLC; Global Petroleum Corporation; and Gulf Oil Limited Partnership

William L. Parker
Fitzhugh, Parker & Alvaro LLP
155 Federal Street
Suite 1700
Boston, MA 02110-1727
(617) 695-2330
(617) 695-2335 (fax)

Richard E. Wallace
Peter C. Condrón
Wallace King Marraro & Branson, PLLC
1050 Thomas Jefferson Street, N.W.
Washington, DC 20007
(202) 204-1000
(202) 204-1001 (fax)

Attorneys for Chevron U.S.A., Inc.; Equilon Enterprises, LLC; Motiva Enterprises, LLC; Shell Oil Company; Shell Oil Products Company; Shell Oil Products Company, LLC; Shell Petroleum, Inc.; and Shell Trading (US) Company

Daniel Rosenfeld
Michael DeMarco
Kirkpatrick & Lockhart, LLP
75 State Street
Boston, MA 02109
(617) 261-3100
(617) 261-3175 (fax)

Rod G. Smith
ConocoPhillips
600 North Dairy Ashford
Houston, TX 77079
(281) 293-1740
(281) 293-3826 (fax)

Attorneys for Defendant ConocoPhillips Company and Tosco Corporation

Deborah E. Barnard
Robin L. Main
Tara Myslinski
Holland & Knight LLP
10 St. James Ave.
Boston, MA 02116
(617) 523-2700
(617) 523-6850 (fax)

**Attorneys for Exxon Mobil Chemical Company, Inc.; Exxon Mobil Corporation;
Exxon Mobil Oil Corporation; Exxon Mobil Refining and Supply Company; and
Mobil Corporation**

William Kayatta
Pierce Atwood
One Monument Square
Portland, ME 04101
(207) 791-1238
(207) 791-1350

Alan J. Hoffman
Blank Rome LLP
One Logan Square, 18th & Cherry Streets
Philadelphia, PA 19103-6998
(215) 569-5505
(215) 832-5505 (fax)

Attorneys for Lyondell Chemical Company

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1

I certify that I conferred with Plaintiffs' counsel, Celeste Evangelisti of Baron & Budd, P.C., on December 11, 2003 pursuant to Local Rule 7.1 and that she advised me that Plaintiffs oppose this Motion.



Lisa G. Arrowood (BBO # 022330)

CERTIFICATE OF SERVICE

I, Lisa G. Arrowood, one of the attorneys for CITGO Petroleum Corporation, hereby certify that I caused a copy of the foregoing to be served upon all counsel on the attached Service List, by U.S. Mail, first class postage prepaid, on December 11, 2003.



Lisa G. Arrowood (BBO # 022330)